

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

BLACK LIVES MATTER SEATTLE-KING  
COUNTY, ABIE EKENEZAR, SHARON  
SAKAMOTO, MURACO KYASHNA-  
TOCHA, ALEXANDER WOLDEAB,  
NATHALIE GRAHAM, AND ALEXANDRA  
CHEN,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

No. 2:20-CV-00887 RAJ

DECLARATION OF CAROLYN BOIES IN  
SUPPORT OF DEFENDANT CITY OF  
SEATTLE'S RESPONSE TO PLAINTIFFS'  
MOTION FOR TEMPORARY  
RESTRAINING ORDER

I, Carolyn U. Boies, being over the age of 18 and competent to testify, declare that:

1. I am an Assistant City Attorney for the City of Seattle and have personal knowledge of the matters herein.
2. The Seattle Community Police Commission ("CPC") also guided development of the SPD crowd management policies. Beginning summer of 2015, CPC engaged with SPD, the Department of Justice, and members of the Monitoring Team concerning both the crowd

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**Peter S. Holmes**  
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1 management policy and overlapping policies concerning use of force. The CPC's involvement  
2 in reviewing and revising these policies is reflected in the true and correct copy of the redlines  
3 they provided to drafts of the policy (attached herein as Exhibit 1) – the majority of which, as  
4 reflected in the policy as approved by the Court, were incorporated.

5 3. The City also attempted to cross-reference some Plaintiffs' declarations with the time-  
6 stamped information from the SPD blotter of events occurring concurrent with the complained  
7 of force incidents and a true and correct copy of the resulting chart is attached herein as Exhibit  
8 2.

9 4. For example, Friday's planned protest is the only one subsequent to George Floyd's death  
10 where all City of Seattle employees were proactively reminded about seeking leave, should  
11 they wish to participate. A true and correct copy of an email message to all City employees  
12 from the Personnel Director, and a subsequent message from Seattle City Attorney Pete  
13 Holmes to all SCAO employees, is attached herein as Exhibit 3.

14 DATED this 11<sup>th</sup> day of June, 2020.

15 s/Carolyn U. Boies  
16 Carolyn U. Boies, WSBA#40395